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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII  
999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466



322504

MAR 9 1993

**FILE PLAN**

7.02

Ref: 8HWM-SR

**MEMORANDUM:**

TO: Susan Muza, ATSDR

FROM: Michael McCeney, RPM *M. McCeney*  
Richardson Flat Superfund Site

SUBJECT: EPA Comments on Draft Addendum to the Richardson Flat Tailings ATSDR  
Public Health Assessment, February 5, 1993.

The following are EPA comments to the above referenced report. Please call me at (303) 294-7169 with questions.

**GENERAL COMMENTS:**

1. EPA recommends that, where appropriate, ATSDR use groundwater MCL's and residential or commercial exposure scenario soil action levels from other Superfund mining sites as points of comparison for observed contaminant concentration at the site.
2. It should be noted in this document that although this study pertains to only the designated tailings areas "A" and "B", it has been reported that large floodplain tailings deposits exist both upstream of the site as well as downstream to as far as the confluence of the Weber River.

**SPECIFIC COMMENTS:**

3. Page 19, Potential Exposure Pathways for Tailings and Surface Soils: In the absence of any formal land-use restrictions governing the use of the property at the site, EPA recommends that the residential use scenario be considered as a cause for a potential soil exposure pathway.
4. Page 22, Fish in Silver Creek: In the Spring of 1992 while conducting a Site tour, Mike Zimmerman, EPA On-scene Coordinator, observed a large pan-sized trout in Silver Creek within the Site boundary. This observation was documented in a formal trip report which can be found in the EPA site files. ATSDR may want to consider making mention of this observation within the report.

5. Page 24, Tailings and Soils Pathways On-site: EPA disagrees with the last sentence in this section. Data from soils and tailings samples collected on-site from both recent EPA studies and older EPA site assessment work indicate that levels of heavy metals are present at levels above health-based soils action levels developed for other Superfund Sites.

6. Page 25, Surface Soil Pathways Offsite: EPA disagrees with the conclusions set forth in this section. EPA believes that it is highly likely that both windblown and floodplain offsite migration of contamination has occurred to the extent that surrounding off-site and downstream soils probably contain heavy metal concentrations that could pose an unacceptable health risk to future exposed populations.

7. Page 27, Conclusion #3: EPA would not agree that a "reported commitment" from the landowner at the site to not develop the property would serve as a permanent and reliable safeguard from inappropriate future land use.

8. Site Area Characterization Recommendations:

EPA would add the following recommendations to this section:

1. To better determine the extent of site impacts to surface and groundwater, especially in the vicinity of the landfill, it is recommended that sampling for contaminants be conducted during variable flow conditions, representing the full range from extreme high flow to low flow conditions.
2. Adverse impacts to habitats and sensitive environments, especially those connected with the human foodchain, should be more definitively assessed at some point.
3. Potential impacts to local water supplies should be more definitively assessed at some point.

9. Cease/Reduce Exposure Recommendations:

EPA would add the following recommendation to this section:

- o Local governments should be encouraged to impose appropriate land-use restrictions both at the site and up-stream and downstream of the site where impacts from tailings are likely to have occurred. These restrictions should be intended to limit any use of affected areas which could result in exposures which would pose an unacceptable health risk.

cc: Laura Clemmens, 8HWM-SR  
Mo Slam, UDEQ

Rick Baird, 8ORC